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Counsel for TransCanada Keystone Pipeline, LP and TransCanada Corporation

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

INDIGENOUS ENVIRONMENTAL
NETWORK, *et al.*,

and

NORTHERN PLAINS RESOURCE
COUNCIL, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
STATE, *et al.*,

Federal Defendants,

and

TRANSCANADA CORPORATION, *et al.*,

Defendants- Intervenors.

CV-17-29-GF-BMM
CV-17-31-GF-BMM

**DEFENDANT-INTERVENORS'
REQUEST FOR TELEPHONIC
STATUS CONFERENCE**

Defendant-Intervenors TransCanada Keystone Pipeline, LP and TransCanada Corporation (collectively, TransCanada) respectfully request that the Court schedule a Telephonic Status Conference in the above-captioned matter.

The Court last held a Telephonic Status Conference on September 25, 2018 (Doc. 216) (September Conference). During the September Conference, the Court addressed, among other items, the status of the State Department's supplemental analysis under the National Environmental Policy Act following the Court's August 15, 2018 Partial Order on Summary Judgment (Doc. 210). In the September Conference, the Court also indicated that it was amenable to holding another status conference shortly following the issuance of a decision resolving the remaining summary judgment claims. On November 8, 2018, the Court issued an Order (Doc. 218) on the remaining summary judgment claims. In light of that Order and its impact on TransCanada's pre-construction activities, as well as TransCanada's contemporaneous filing of a motion to amend the Court's November 8 Order, TransCanada would like an opportunity to confer with the Court and parties in this case as soon as possible. Thus, TransCanada respectfully requests that the Court schedule a Telephonic Status Conference at its earliest convenience so that the Court and parties may confer on a path forward.

Pursuant to local rule 7.1(c)(1), counsel for TransCanada contacted counsel for the parties regarding the filing of this motion. Plaintiffs Northern Plains

Resource Council, Bold Alliance, Center for Biological Diversity, Friends of the Earth, Natural Resources Defense Council indicated to counsel that they take no position on this motion, and Sierra Club and Plaintiffs Indigenous Environmental Network and North Coast River Alliance indicated to counsel that they have no objection to this motion. Federal Defendants indicated to counsel that they do not object to this motion.

Dated this 15th day of November, 2018,

/s/ Jeffery Oven

Jeffery J. Oven

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2018, a copy of the foregoing motion was served on all counsel of record via the Court's CM/ECF system.

/s/ Jeffery Oven